

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
V.) NO. 04-10310-WGY
LORRAINE MOTT)

MOTION TO EXTEND TIME TO
FILE OBJECTIONS TO PRESENTENCE REPORT

The defendant moves that this Court extend the time to file objections to the pre-sentence report from June 14, 2005 until July 11, 2005. In support of this motion, the defendant states the following:

1. This matter is currently scheduled for a Rule 11
Hearing on July 18, 2005 at 2:00.

2. The government and the defendant are attempting to resolve this case without the necessity of a Rule 11 Hearing. The parties could not begin intense negotiations until the Pre-sentence report was completed. The parties received the report on June 1, 2005.

3. More time is necessary in order to hopefully reach a resolution to this matter and/or file objections to the pre-sentence report.

WHEREFORE, the defendant moves that this Court extend the time to file objections to the pre-sentence report until July 11, 2005.

Lorraine Mott
By Her Attorneys

CARNEY & BASSIL

/s/Andrew D'Angelo

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Date: June 14, 2005